

I oppose any expansion of HF phone allocations on Amateur Radio frequencies.

The survey on which the ARRL's petition was based was severely flawed and cannot be said to represent the views of a majority of Amateur Radio Operators. If the Commission accepts the results of a survey as an argument in support of a petition, then it should verify that the survey was accurate and fair.

The "Novice allocations" are areas of HF spectrum where Novices and Novice Technician licensees were allowed to operate, sharing spectrum with the higher license classes. Abandoning the Novice license does not "free up" bandwidth which must somehow be allocated-- it is already allocated and no change is necessary. Power limitations could be removed to the extent that they no longer serve to protect other users of the "Novice bandwidth" (e.g. commercial broadcasters) but the ARRL has failed to present a convincing argument that the basic usages need to be changed.

Furthermore, if the intention of the the petition is to provide additional spectrum for phone operations, the Commission should verify that the the existing bands are in fact over-crowded and that an additional few kilohertz (e.g. room for 8 more SSB QSOs on 40M) will provide significant relief.

Respectfully submitted,

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